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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **OAKLAND DIVISION**

11 Abdi Nazemian, et al.,  
12 Plaintiffs,  
13 vs.

14 NVIDIA Corporation,  
15 Defendant.

16 Andre Dubus III, et al.,  
17 Plaintiffs,  
18 vs.

19 NVIDIA Corporation,  
20 Defendant.  
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Case No. 4:24-cv-01454-JST (SK)  
Case No. 4:24-cv-02655-JST (SK)

**JOINT STIPULATION AND ORDER RE  
DEPOSITION PROTOCOL SUBMISSION  
DEADLINE**

1 Pursuant to Civil Local Rule 7-12, the undersigned Parties to the above-captioned action, by and  
2 through their respective counsel of record, hereby stipulate the following:

3 1. WHEREAS, on August 29, 2024, the Parties appeared before the Honorable Judge Tigar  
4 for an Initial Case Management Conference, (Case No. 4:24-cv-01454-JST (SK) ("*Nazemian*"), ECF No.  
5 66; Case No. 4:24-cv-02655-JST (SK) ("*Dubus*"), ECF No. 56), and the Court ordered the Parties to meet  
6 and confer on a proposed case schedule (*Nazemian*, ECF No. 68; *Dubus*, ECF No. 57);

7 2. WHEREAS, on September 9, 2024 in the *Nazemian* case and on September 10, 2024 in  
8 the *Dubus* case the Parties submitted a stipulated case schedule, which included March 25, 2025 as the  
9 deadline by which the parties must submit an agreed upon Deposition Protocol or a joint letter brief  
10 regarding any disputed areas (*Nazemian*, ECF No. 70; *Dubus*, ECF No. 58);

11 3. WHEREAS, on September 11, 2024, the Court ordered the parties' stipulated case  
12 schedule, including the Deposition Protocol submission deadline (*Nazemian*, ECF No. 71; *Dubus*, ECF  
13 No. 59);

14 4. WHEREAS, on March 6 and 12, 2025, additional counsel joined the case for Plaintiffs  
15 (*Nazemian*, ECF Nos. 106-122, 124-26);

16 5. WHEREAS, the Parties believe that an extension of the Deposition Protocol deadline is  
17 needed so they can make progress toward a stipulated protocol; and

18 6. WHEREAS, the requested extension will not affect any other date scheduled in this case;

19 NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the Parties  
20 and their respective counsel, subject to the Court's approval, that the Parties' deadline to submit an  
21 agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas, shall be extended  
22 from March 25, 2025 to April 24, 2025.  
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1 Dated: March 21, 2025

Respectfully submitted,

2 By: /s/ Joseph R. Saveri

3 Joseph R. Saveri (SBN 130064)  
4 Christopher K.L. Young (SBN 318371)  
5 Evan Creutz (SBN 349728)  
6 Elissa A. Buchanan (SBN 249996)  
7 William Castillo Guardado (SBN 294159)  
8 **JOSEPH SAVERI LAW FIRM, LLP**  
9 601 California Street, Suite 1505  
10 San Francisco, California 94108  
11 Telephone: (415) 500-6800  
12 Facsimile: (415) 395-9940  
13 jsaveri@saverilawfirm.com  
14 cyoung@saverilawfirm.com  
15 ecreutz@saverilawfirm.com  
16 eabuchanan@saverilawfirm.com  
17 wcastillo@saverilawfirm.com

18 Matthew Butterick (SBN 250953)  
19 1920 Hillhurst Avenue, #406  
20 Los Angeles, CA 90027  
21 Telephone: (323) 968-2632  
22 Facsimile: (415) 395-9940  
23 mb@buttericklaw.com

24 Brian D. Clark (admitted *pro hac vice*)  
25 Laura M. Matson (admitted *pro hac vice*)  
26 Arielle Wagner (admitted *pro hac vice*)  
27 Eura Chang (admitted *pro hac vice*)  
28 **LOCKRIDGE GRINDAL NAUEN PLLP**  
29 100 Washington Avenue South, Suite 2200  
30 Minneapolis, MN 55401  
31 Telephone: (612)339-6900  
32 Facsimile: (612)339-0981  
33 bdclark@locklaw.com  
34 lmmatson@locklaw.com  
35 aswagner@locklaw.com  
36 echang@locklaw.com

37 Justin A. Nelson (admitted *pro hac vice*)  
38 Alejandra C. Salinas (admitted *pro hac vice*)  
39 **SUSMAN GODFREY L.L.P**  
40 1000 Louisiana Street, Suite 5100  
41 Houston, TX 77002-5096  
42 Telephone: (713) 651-9366

jnelson@susmangodfrey.com  
asalinas@susmangodfrey.com

Rohit D. Nath (SBN 316062)  
**SUSMAN GODFREY L.L.P**  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067-2906  
Telephone: (310) 789-3100  
RNath@susmangodfrey.com

Elisha Barron (admitted *pro hac vice*)  
Craig Smyser (admitted *pro hac vice*)  
**SUSMAN GODFREY L.L.P**  
One Manhattan West, 51st Floor  
New York, NY 10019  
Telephone: (212) 336-8330  
ebarron@susmangodfrey.com  
csmyser@susmangodfrey.com

Jordan W. Connors (admitted *pro hac vice*)  
Trevor D. Nystrom (admitted *pro hac vice*)  
**SUSMAN GODFREY L.L.P**  
401 Union Street, Suite 3000  
Seattle, WA 98101  
Telephone: (206) 516-3880  
jconnors@susmangodfrey.com  
tnystrom@susmangodfrey.com

Rachel J. Geman (pro hac vice)  
Danna Z. Elmasry (pro hac vice)  
**LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP**  
250 Hudson Street, 8th Floor  
New York, NY 10013  
Tel.: 212.355.9500  
rgeman@lchb.com  
delmasry@lchb.com

Anne B. Shaver  
**LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP**  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
Tel.: 415.956.1000  
ashaver@lchb.com

Betsy A. Sugar (pro hac vice)  
**LIEFF CABRASER HEIMANN**

**& BERNSTEIN, LLP**

222 2nd Avenue S. Suite 1640

Nashville, TN 37201

Tel.: 615.313.9000

bsugar@lchb.com

*Attorneys for the Nazemian Plaintiffs and the Proposed Class*

1 Dated: March 21, 2025

Respectfully submitted,

2 By: /s/ Bryan L. Clobes

3 Bryan L. Clobes (admitted *pro hac vice*)

Alexander J. Sweatman (admitted *pro hac vice*)

4 Mohammed Rathur (admitted *pro hac vice*)

**CAFFERTY CLOBES MERIWETHER**

**& SPRENGEL LLP**

5 135 South LaSalle Street, Suite 3210

6 Chicago, IL 60603

7 Tel: 312-782-4880

bclobes@caffertyclobes.com

8 asweatman@caffertyclobes.com

mrathur@caffertyclobes.com

9 David A. Straite (admitted *pro hac vice*)

10 **DiCELLO LEVITT LLP**

485 Lexington Avenue, Suite 1001

11 New York, NY 10017

12 Tel. (646) 933-1000

dstraite@dicellolevitt.com

13 Amy E. Keller (admitted *pro hac vice*)

14 Nada Djordjevic (admitted *pro hac vice*)

15 James A. Ulwick (admitted *pro hac vice*)

**DiCELLO LEVITT LLP**

16 Ten North Dearborn Street, Sixth Floor

Chicago, Illinois 60602

17 Tel. (312) 214-7900

akeller@dicellolevitt.com

18 ndjordjevic@dicellolevitt.com

19 julwick@dicellolevitt.com

20 Brian O'Mara (SBN 229737)

**DiCELLO LEVITT LLP**

21 4747 Executive Drive

San Diego, California 92121

22 Telephone: (619) 923-3939

23 Facsimile: (619) 923-4233

briano@dicellolevitt.com

24 *Counsel for the Dubus Plaintiffs and Proposed Class*

1 Dated: March 21, 2025

Respectfully Submitted,

2 By: /s/ Sean S. Pak

3 **QUINN EMANUEL URQUHART &**  
4 **SULLIVAN, LLP**

5 Sean S. Pak (SBN 219032)  
6 seanpak@quinnemanuel.com  
7 50 California Street, 22nd Floor  
8 San Francisco, CA 94111  
9 Telephone: (415) 875-6600  
10 Facsimile: (415) 875-6700

11 Andrew H. Schapiro (admitted *pro hac vice*)  
12 andrewschapiro@quinnemanuel.com  
13 191 N. Wacker Drive, Suite 2700  
14 Chicago, Illinois 60606  
15 Telephone: (312) 705-7400  
16 Facsimile: (312) 705-4001

17 Alex Spiro (admitted *pro hac vice*)  
18 alexspiro@quinnemanuel.com  
19 51 Madison Avenue, 22nd Floor  
20 New York, NY 10010  
21 Telephone: (212) 849-7000  
22 Facsimile: (212) 849-7100

23 *Attorneys for Defendant NVIDIA Corporation*

**ORDER**

Pursuant to the stipulation of the Parties, it is hereby ORDERED that the Parties' deadline for filing an agreed upon Deposition Protocol, or filing a joint letter brief with the Parties' respective proposals shall be continued to April 24, 2025.

**IT IS SO ORDERED.**

Dated: March 25, 2025



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The Honorable Sallie Kim  
U.S. Magistrate Judge



**ATTESTATION PURSUANT TO CIVIL L.R. 5-1**

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: March 21, 2025

/s/ Sean S. Pak  
Sean S. Pak